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May 22, 2023

By ECF

Honorable Robert M. Levy
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Gov't Emps. Ins. Co. et al. v. Konata Solomon Stallings (A Sole Proprietorship), et al.
Docket No.: 1:22-cv-06306-DG-RML**

Dear Magistrate-Judge Levy:

I write on behalf of Plaintiffs Government Employees Insurance Co., GEICO Indemnity Co., GEICO General Insurance Company and GEICO Casualty Co. (collectively "GEICO" or "Plaintiffs") pursuant to the Court's April 21, 2023, Order.

As the Court is aware, Defendant Konata Solomon Stallings, Psy.D. ("Stallings") filed a petition for bankruptcy in the United States Bankruptcy Court for the Eastern District of New York, under Case No. 23-40904-ess (the "Bankruptcy Proceeding"). We have discussed this matter with the Bankruptcy Trustee, who already conducted a §341 meeting of the creditors, and the Trustee is aware of our desire to resolve GEICO's claims against Stallings and his sole proprietorship. We are in the process of further discussing this matter with the Bankruptcy Trustee and hope to obtain a resolution that will include this federal action. We are cautiously optimistic that within the next month we will be able to confirm whether a settlement with Stallings and the Bankruptcy Trustee is forthcoming. In the event that we cannot reach a successful resolution, we are likely to file a motion to lift the automatic stay so that we can pursue the claims against Stallings in this Court as well as against remaining defendants.

We would, therefore, ask the Court to set another status report for 30 days from today to give us the additional time needed to address the bankruptcy related issues.

Respectfully submitted,

RIVKIN RADLER LLP

/s/ Michael Vanunu

Michael Vanunu

cc: All counsel via ECF